

MEMORANDUM

MAY 13 1996 **CH2M HILL**

PREPARED FOR: Sylvia Burges/EPA Region 10

DATE: May 10, 1996

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TECHNICAL STATUS REPORT

CH2M HILL

PREPARED FOR: Sylvia Burges/EPA Region 10
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PREPARED BY: Liz Luecker/CH2M HILL
DATE: May 10, 1996
SUBJECT: Rhône-Poulenc Monthly Status Report
SITE NAME AND LOCATION: Rhône-Poulenc Inc. Seattle Plant
Tukwila, WA
REPORTING PERIOD: April 1 through April 30, 1996
PROJECT: 106063.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RP) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

Progress Made This Reporting Period

Task P1-Project Management

The EPA status report was faxed to EPA on April 10 and mailed the same day.

Task A3-Interim Measures

Report.

A report documenting the compressor pad excavation, the PCB ditch excavation, sewer cleaning, and disposal of associated waste streams is currently being developed by Terra Nova Environmental Sciences and CH2M HILL.

LNAPL.

RP monitored the wells for LNAPL on April 30. The wells monitored for LNAPL were: H10, MW-12, H11, DM-7, H9, G3, B6, MW-14, MW-15, MW-17, MW-18, MW-19, and MW-20. Well B6 was not accessible at this time because a container belonging to Northwest Container was stored on top of it. No well monitored contained a measurable amount of LNAPL. The sample from well H10 had a film. The samples from wells H11, MW-18, and MW-19 had a sheen, while the sample from MW-12 had oily globules. The

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remaining wells surveyed did not contain LNAPL. Information on the LNAPL thicknesses is attached.

Task A8-Round 3 Technical Memorandum

RP and CH2M HILL received EPA's and Ecology's comments on the Round 3 Technical Memorandum on April 2. On April 8, RP sent a letter to Sylvia Burges/EPA 10 requesting a meeting or telephone conference to resolve various agency comments.

Task S1-Miscellaneous Field Support

PCB-Contaminated Sewer Wash Water and Sludge and API Separator Clean Out.

RP scheduled the cleaning of the API separator for April 11. On April 10, the RP Seattle plant was notified by RP-Houston that they could not accept the waste because of presence of PCBs.

Sewer Wash Water in Rain-for-Rent Tank.

On April 1, the remaining water from cleaning the non-PCB-contaminated sewer lines was pumped from the Rain-for-Rent tank (239617) and placed in a mobile holding tank and 17 drums. The water in the mobile holding tank was recirculated through one-micron filters and then sampled on April 4. The sample was analyzed by Sound Analytical on April 5. The sample contained 4.1 mg/l copper. The water in the mobile tank (approximately 500 gallons) was discharged to Metro on April 10.

Ten of the 17 drums of water were transferred to the mobile holding tank on April 10; this water was also recirculated through one-micron filters. The water was sampled and the sample sent to Sound Analytical on April 11. Results received on April 12 indicated that the sample contained 0.29 mg/l copper. This water (approximately 500 gallons) was discharged to Metro on April 12.

CEcon Corporation cleaned the Rain-for-Rent tank on April 10. The rinsate and sludge were placed in 8 drums. The tank contained little sludge; sludge shoveled out of the tank filled approximately 1/2 of one of the 8 drums. Five wipe samples were collected by CEcon and sent to Sound Analytical for PCB analysis. On April 12, analytical results showed PCBs were not detected in the wipe samples. The Rain-for-Rent tank was removed from the facility on April 16.

Between April 12 and 24, the remaining 7 drums of water from the Rain-for-Rent tank and 3 of the 8 drums of tank rinsate were transferred to the mobile holding tank. This water was recirculated through one-micron filters. A sample was collected on April 24 and sent to Sound Analytical for analysis. The sample contained 0.90 mg/l copper. This

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water was discharged to Metro on April 29. Of the remaining 5 drums of rinsate, one drum is approximately 1/2 full of sludge.

Task S3-Laboratories

Due to problems with the existing laboratory, CH2M HILL is in the process of re-procuring analytical services. The bid package was sent to IEA, ARI, S-Cubed, Quanterra, and QAL. RP is evaluating the laboratories.

Deliverables Submitted

The March Progress Report was submitted to U.S. EPA on April 10, 1996.

RP submitted a letter to U.S. EPA on April 8, 1996 requesting clarification of issues raised in agency comments on the Round 3 Technical Memorandum.

Progress Planned For Next Reporting Period

Task A2-Applicable Regulations and Permits

Leasing Arrangements.

The PCB ditch area will be paved by Lakeridge Paving once excavation of contaminated soils is complete and EPA approves the Interim Measures report.

The soil and shrubbery Northwest Container Services' contractor removed from the area near the Facility's North Road, near the entrance (in RFI investigation Areas BG and A3) and from south of the laboratory building (in Area 3) is still being stockpiled on site. The soil was placed in two dirt piles (approximately 10 cubic yards) located at the northwest corner of the laboratory building and a third pile located southwest of the laboratory building (approximately 100 cubic yards).

Storm Water.

Sediments in the bottom of the 800,000 gallon open-top tank will be cleaned out and may be managed with the non-PCB-contaminated wash water sediments. This cleaning may be held off until the rainy season is over so that solidification of the sediments before landfilling can be minimized.

Task A3-Interim Measures

LNAPL.

Continue to monitor LNAPL thicknesses in selected monitoring wells monthly.

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Task A8-Round 3 Data Technical Memorandum

RP is preparing a response to EPA and Ecology comments on the Round 3 Technical Memorandum.

Task S1-Miscellaneous Field Support

Drum Disposal.

A total of 32 drums of wastes remain on site. The wastes include:

- 12 drums of sludge from cleaning the PCB-contaminated wash water tanks,
- 8 drums of rinsate from cleaning the PCB-contaminated wash water tanks,
- 5 drums of sludge from cleaning the non-PCB-contaminated wash water tanks,
- 4 drums of rinsate from the April 10 cleaning of the last Rain-for-Rent tank,
- one partial drum of sludge and rinsate from the April 10 cleaning of the last Rain-for-Rent tank,
- 2 drums of used activated carbon

The rinsate and standing water in the sludge drums will be filtered through one-micron filters and discharged to Metro, if the water meets Metro's discharge limits.

The various sludges will be solidified and landfilled at the Waste Management, Inc., hazardous waste facility in Arlington, OR. Testing has shown that the sludges contain less than 50 ppm PCBs.

The activated carbon drums will be sent to the Rollins/Aptus facility in Aragonite, UT for incineration.

API Separator Clean Out.

The water layer in the API Separator will be pumped off, filtered, and discharged to Metro. CEcon will clean the separator, and the combined upper emulsion and lower sludge layers will be solidified for landfilling at the Waste Management, Inc., hazardous waste facility in Arlington, OR.

Outfall 4 Wash Water in Aluminum Tank.

Approximately 1,000 gallons of outfall 4 wash water and sludge are in the aluminum tank. The water in the aluminum tank will be filtered on site through one-micron filters and discharged to Metro, if possible. Sludge in the tank will be removed, solidified, and landfilled at the Waste Management, Inc., hazardous waste facility in Arlington, OR.

rhône-p/MSR/04-96EPA

RHONE POULENC - MARGINAL WAY FACILITY
MONTHLY LNAPL SURVEY LOG
Floating Product Layer Thickness in Feet

Date Sampled	H10	H1	MW12	H11	DM7	H9	H6	DM2A	DM2B	DM8	A9	DM3A	DM3B	A2	A4	DM4	B4	B2	DM5	B1A	B1B	C1	DM6	B5	G3	G1	B6	MW13	MW14	MW15	MW16	MW17	MW18	MW19	MW20	DMI A	DMI B	E3			
6/7/94	0		0																																						
6/8/94	0		0																																						
6/17/94	Film	0	0.007	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0														
8/4/94	Film	Sheen	Sheen	Film	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0														
9/8/94	Film	0	Film	0.01	0	Sheen	Sheen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.021	0.005	0	0	0.01	0					
10/6/94	0	0	Sheen	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0.021	0						
11/3/94	0	0	0.005	0.005	0	0	0	0	0	0	-0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0.01	0	0	0	0						
12/5/94	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0						
1/11/95	0.26 ^a	Sheen	Sheen	0.04 ^d	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0.01 ^a	0	0	0	0	0	0	0			
2/17/95	2.01	0	0.16	Sheen	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0 ^b	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0			
3/23/95	0.01										0	0	0	0	0 ^c					0	0	0													0	0	Sheen ^c				
3/27/95		0	Sheen	0	0	0	0	0	0	0						0	0	0	0				0		0	0	0	0	0	0	0	0	0	0	0	0	0				
3/28/95																								0																	
4/27/95	0.063	0	Film ^d	0		0				0	0	0	0	NA	0		0	0	0	0	0	0	0	0	0	0	0	0	0				0	0.063 ^e	Sheen	0					
4/28/95					0		0	0	0							0														0	0										
5/31/95	0.01	0	Film	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
6/30/95	Sheen ^d	0	Film	NA	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	Sheen	Sheen	0	0	0	0	0	0	0		
7/28/95																	0			0			0	0	0		0	0		0	0										
7/29/95	Sheen	0	Sheen	NA	0	0	0	0	0	0	0	0	0	NA	0	NA		0	0		NA					0	0	0				0	0		0	0					
8/26/95	Sheen	0	Sheen	0	0	0	0	0	0	0	0	0	0	NA	0	NA	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
9/29/95	0.03	0			0	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	0	0	0	0		
10/4/95			Sheen ^d	^d												0												0													
10/30/95	0.03	0	^d	Film	0	0						0	0	0	0	0	0	0	NA	NA		0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	
10/31/95							0	Sheen	Sheen	0	0							NA	NA	0					NA																
11/30/95	Film	0	Sheen	Film	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0		
12/31/95	0.2	0	Film	Sheen	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	NA	0	NA	NA	0	0	0	0	0	0	0	0	0	0	0	0	
1/3/96	1.17		^d	Sheen	0	0																			0		NA		0	0		0	0	0	0	0	0	0	0		
2/27/96	Film ^s		0	Sheen	0	0																			0		0		0				0.09	0	0 ^f						
3/31/96	Film		Film	0	0																			0		NA		0	0	0	0	0	0	0	0	0	0	0	0		
4/29/96	Film		^d	Sheen	0	0																		0		NA		0	0	0	0	0	0	0	0	0	0	0	0	0	
